

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

LOUIS E. MALVEZZI

Plaintiff,

v.

**HARTFORD CASUALTY
INSURANCE COMPANY**

Defendant.

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CASE NO. _____

NOTICE OF REMOVAL

Comes Defendant Hartford Casualty Insurance Company, by and through counsel, and gives notice of its removal of this case to this Court. In support of its Notice of Removal, Defendant asserts as follows:

1. On January 31, 2014, Plaintiff filed a Complaint in the Chancery Court of Tennessee for the Thirtieth Judicial District at Memphis, Shelby County, Docket No. CH-14-0159-I, against the above-named Defendant.

2. Copies of the complete state court file are attached hereto as Collective Exhibit 1. These documents are all the processes, pleadings and orders filed with Shelby County Chancery Court to date.

3. Plaintiff was at the time of the commencement of said action and still is a citizen and resident of the state of Tennessee and of no other state.

4. Defendant was at the time of the commencement of said action and still is a corporation organized under the laws of the state of Indiana and of no other state, with its principal place of business in Indiana.

5. In Plaintiff's prayer for relief, Plaintiffs seek damages of \$150,000.00 plus attorney's fees and punitive damages. As a result, the amount in controversy exceeds the sum or value of \$75,000.00. Since the amount in controversy exceeds the sum or value of \$75,000.00, is wholly between the citizens of different states, and is within the jurisdiction of this Court pursuant to the provisions of Title 28 United States Code § 1332, it is removable to this Court pursuant to the provisions of Title 28 United States Code § 1441.

WHEREFORE, Defendant prays that this Court accept this Notice and proceed with the action heretofore referred to in accordance with law.

Submitted this the 7th day of March, 2014.

Respectfully submitted,

**LEITNER, WILLIAMS, DOOLEY
& NAPOLITAN, PLLC**

By: /s/ Christen Blackburn

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in this cause by electronic notification through the Court's CM/ECF System and/or U.S. Mail, postage prepaid to:

Robert F. Uhlmann
BPRN 4440
5050 Poplar Avenue, Suite 1134
Memphis, TN 38157
(901) 525-2426
rob@cuadw.com

This the 7th day of March, 2014.

s/ Christen Blackburn
Christen Blackburn